

U.S. Department of Justice

United States Attorney Eastern District of New York

ALB:ABK F. #2014R00891 271 Cadman Plaza East Brooklyn, New York 11201

September 23, 2014

By Federal Express

Anthony M. LaPinta, Esq. Reynolds, Caronia, Gianelli, Hagney, LaPinta & Hargraves 35 Arkay Drive Hauppauge, NY 11788

Re: United States v. Joseph Valerio

Criminal Docket No. 13-0094 (JFB)

Dear Mr. LaPinta:

Per your September 18, 2014 request, the government makes the following expert disclosure pursuant to Rule 16(a)(1)(F) and (G) of the Federal Rules of Criminal Procedure.

At trial in this matter, the government expects to call as an expert witness Rory Forrestal, a Detective with the Suffolk County Police Department, Computer Crimes Unit. Det. Forrestal is expected to testify regarding the forensic examination of computer evidence seized during the execution of the search warrants at your client's home, including, but not limited to, a computer, digital video camera and digital storage device belonging to the defendant. Among other things, the government anticipates that Det. Forrestal will testify about his creation of forensic images of the defendant's digital devices, as well as information about certain of the digital files that he located on those devices.

In connection with Det. Forrestal's anticipated testimony, please find the following enclosed materials in hard copy:

Description	Bates Numbers
Supplementary Report (report of testing)	FORRESTAL 000001 -
	FORRESTAL 000004
Inventory and acquisition records	FORRESTAL 000005 -
	FORRESTAL 000047
Notes and print-outs (images of child	FORRESTAL 000048 -
pornography have been redacted as indicated)	FORRESTAL 000081
Curriculum Vitae	FORRESTAL 000082 -
	FORRESTAL 000086

The government previously made available all physical evidence in this case, and your and your client have reviewed videos and images of child pornography the government intends to introduce as evidence at trial. Further inspection of these materials, or any of the items referenced in Det. Forrestal's report, can be arranged by contacting the undersigned.

The government continues to reserve its right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intention to do so. In addition, the government requests reciprocal discovery from the defendant pursuant to Rule 16(b)(1)(A), (B) and (C).

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/
Ameet B. Kabrawala
Assistant U.S. Attorney
(718) 254-6001

Enclosures

cc: Clerk of Court (JFB) (by ECF) (without enclosures)